REDACTED VERSION

EMERGENCY RESPONSE REPORT

FOR

IPMR
1416 INDUSTRIAL DRIVE
ROYSE CITY, ROCKWALL COUNTY, TEXAS

Prepared for

U.S. Environmental Protection Agency Region 6
Linda Carter, Project Officer
1445 Ross Avenue
Dallas, Texas 75202

Contract No. EP-W-06-042
TDD No. TO-0001-12-01-03
WESTON W.O. No. 20406.012.001.0701.01
NRC No. N/A
FPN: N/A
CERCLIS ID: N/A
EPA OSC: Adam Adams
START-3 PTL: (b) (7)(C) [redacted]

Submitted by

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13 July 2012

90044668

PROJECT SUMMARY

This final report describes the U.S. Environmental Protection Agency (EPA) response actions for the IPMR response. The detailed report follows this page, and all attachments are provided as separate portable document format (PDF) files. On 24 January 2011, the U.S. Environmental Protection Agency (EPA) Criminal Investigation Department (CID) requested assistance from the EPA Region 6 Prevention and Response Branch (EPA-PRB) to conduct a site investigation at the primary IPMR (Industrial Precious Metals Recovery) facility in Royse City, Rockwall County, Texas, and the IPMR warehouses in Caddo Mills, Hunt County, Texas. The EPA Region 6 Superfund Technical Assessment and Response Team (START-3) contractor was activated by the EPA-PRB to conduct a Tier 3 Response with air monitoring for health and safety purposes; sampling of liquids and soils; and potentially Level B entries. The purpose of the liquid and soil sampling was to support EPA CID to determine if any hazardous materials had contaminated the property surrounding the facility due to poor housekeeping by the facility owner/operator.

On the morning of 27 January 2012, EPA mobilized to the site with START-3 contractors to conduct assessment activities. Response actions were documented and photo-documented. Air monitoring was conducted, and 15 surface soil and 3 liquid samples were collected. Upon completion of the assessment actions, EPA and contractors demobilized from the site on 27 January 2012.

This final report was prepared by Weston Solutions, Inc. under Contract No. EP-W-06-042 for EPA Region 6.

☐ The EPA Task Monitor did not provide final approval of this report prior to the completion date of the work assignment. Therefore, Weston Solutions, Inc. has submitted this report absent the Task Monitor's approval.

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TABLE OF CONTENTS

1. PROJECT IDENTIFICATION

Date: 13 July 2012

To: Adam Adams, On-scene Coordinator (OSC)
U.S. Environmental Protection Agency (EPA)
Region 6, Prevention and Response Branch

Through: Linda Carter, Project Officer (PO)
EPA Region 6, Program Management Branch

Through: (b) (7)(C) Weston Solutions, Inc. (WESTON®)
EPA Region 6, Superfund Technical Assessment and Response Team (START-3)
Program Manager

From: (b) (7)(C), WESTON
EPA Region 6, START-3 Project Team Leader (PTL)

Subject: Emergency Response: IPMR (Industrial Precious Metals Recovery)
1416 Industrial Drive, Royse City, Rockwall County, Texas
TDD No: TO-0001-12-01-03
WESTON Work Order No. 20406.012.001.0701.01
NRC No: N/A
FPN: N/A
CERCLIS ID: N/A
Royse City Location:
Latitude 32.98721° North
Longitude 96.30295° West
Caddo Mills Location:
Latitude 33.03481° North
Longitude 96.18833° West

Geographic coordinates of the facility were determined by START-3 members using the hand-held Global Positioning System (GPS) based on the World Geodetic System – 1984 (WGS-84) with accuracy estimated at less than 50-feet circular probable error.

2. INTRODUCTION

On 24 January 2011, the U.S. Environmental Protection Agency (EPA) Criminal Investigation Department (CID) requested assistance from the EPA Region 6 Prevention and Response Branch (EPA-PRB) to conduct a site investigation at the Industrial Precious Metals Reclamation (IPMR) facilities in Royse City, Rockwall County, Texas, and in Caddo Mills, Hunt County, Texas. The

EPA Region 6 Superfund Technical Assessment and Response Team (START-3) contractor was activated by the EPA-PRB to conduct a Tier 3 Response with written and photographic documentation of response activities; a preliminary assessment of site conditions; air monitoring for health and safety purposes; liquid and surface soil sampling; and potentially Level B entries. Sampling was conducted to determine the release of hazardous materials or hazardous substances due to operations conducted at the IMPR facility.

3. BACKGROUND

The IPMR facility is an active precious metals reclamation business that removes small quantities of gold and other precious metals from by-products or waste materials. The reclamation process used at this facility is called aqua regia and utilizes nitric acid, hydrochloric acid, sodium sulfide, zinc powder, and calcium oxide throughout their process as well as for neutralization of residue prior to disposal of the waste materials.

The primary facility and offices are located on approximately 0.5 acre of land in an industrial complex at 1416 Industrial Drive, Royse City, Rockwall County, Texas. The three warehouses supporting the operation are located at 3232, 3234, 3236, and 3238 Interstate 30 Frontage Road, Caddo Mills, Hunt County, Texas on approximately 3.5 acres approximately 7.5 miles to the northeast of the primary facility on the north side of Interstate 30. Attachments A, B, C, and D depict the Site Location Map, Site Area Map, Facility Location Site Sketch, and Warehouse Locations Site Sketch, respectively.

4. ACTIONS TAKEN

Purpose of Assessment

The response action was conducted to determine the release of hazardous materials from the operations conducted at the IPMR facility.

Primary Facility

After the facility was secured, an initial walk through was conducted with air monitoring equipment to assess any potential hazardous conditions or releases of hazardous substances.

Equipment utilized for air monitoring included a MultiRae Plus to monitor for the presence of volatile organic compounds (VOCs), lower explosive limit (LEL), oxygen, carbon monoxide, and hydrogen sulfide; multiple V-Raes to monitor for sulfur dioxide, ammonia, hydrogen cyanide, chlorine, phosphine, and nitrogen dioxide; a TVA 1000B equipped with an Flame Ionization Detector (FID) and a Photo Ionization Detector (PID) to conduct additional VOCs monitoring; and a Ludlum Model 19 MicroR Meter to monitor for radiation. All readings were at background levels except for chlorine, which was detected at 7.1 parts per million (ppm) along the easternmost wall of the building where the aqua regia is performed. The background for chlorine was 0.0 ppm. During the walk through and initial assessment, observations include 4 drums that were labeled as containing nitric or hydrochloric acid; 8 unlabeled open top drums; 4 tubs approximately 60 gallons in size, containing liquid and sludge like materials; 5 plastic totes approximately 200 gallons in size containing waste products; and approximately 12 kitchen style crock pots. Several observations indicated poor housekeeping practices within the building, including pooled liquids and extensive iron oxide deterioration along the exterior metal siding of the building. Standing liquid in the east end of the building in a concrete 3-inch high containment was measured with pH litmus paper and exhibited a pH of 2. Red staining was observed on the ground around the building and down the surface drainage pathway outside of the facility within the fenced area of the property. Drainage from the site is to the north to a large ditch, then via several overland runoff pathways and ditches and into Sabine Creek, approximately 0.5 miles from the site. The evident release to the surface water pathway is a concern based on the results of the sampling results described in this report.

From this primary IPMR facility, surface soil samples were collected along the runoff pathways outside the building, a duplicate sample was collected, and a background sample was collected from a lateral area on the west side of the cul-de-sac not in the facility drainage pathway. A total of nine surface soil samples were collected and labeled S01-01 through S01-09 as illustrated in Attachment C. These samples were analyzed for Total Resource Conservation and Recovery Act (RCRA) metals, Toxicity Characteristic Leaching Procedure (TCLP) RCRA Metals, and pH.

Warehouse Locations

While assessment activities continued at the primary operations building, entry and initial assessments were conducted at the warehouse locations and were consistent with those conducted at the primary operations building. The same air monitoring instrumentation was utilized, and all readings were below background levels. The warehouse locations consist of three warehouse buildings (numbered 2, 3, and 4) with a security fence along the perimeter of each building. Building 2 observations indicated a predominantly empty structure with a few open-top drums, totes, and bins containing trash and used kitchen style crock pots. A garden hose and a small portable plastic pool propped up on one end that contained less than a quart of liquid were found. The pH of the liquid was measured to be pH 1. Buildings 3 and 4 were relatively empty as well, and there were indications cleaning efforts had been conducted recently.

After completion of sampling at the primary facility, sampling was conducted at the warehouse locations consistent with previous sampling efforts. Samples were collected at four locations where green-stained soil was observed on the north and west side of building 3. Samples were labeled S03-01 through S03-04 as illustrated in Attachment D. Upon completion of sampling activities at building 3, two surface soil samples and two liquid samples north of building 2 were collected from locations as illustrated in Attachment D. The surface soil samples were labeled S02-01 through S02-02. The liquid samples were collected in a sump to the northwest of building 2 at an approximate depth of 3 feet and are labeled T02-01 and T02-02, with T02-02 being the duplicate sample. Liquid was also collected from a hose that was found within building 2 and was labeled T02-03. All soil and liquid samples collected at the warehouse location were analyzed for Total RCRA metals (including mercury), TCLP RCRA metals (including mercury), and pH. START-3 was not instructed to collect any samples in the immediate proximity of building 4.

Nearby Population

Based on available data, there are approximately 500 persons that live within the 1-mile radius of the primary IPMR facility and approximately 200 persons that live within the 1-mile radius of

the warehouse locations. The population estimate includes those persons in houses, schools, or day care facilities within 1 mile of the site.

Sampling and Results

Samples were collected in accordance with the Quality Assurance Sampling Plan (QASP), applicable sampling standard operating procedures (SOPs), and general sampling guidance documents including the EPA *Contract Laboratory Program (CLP) Guidance for Field Samplers*, EPA540-R-00-003, OSWER 9240.0-35. The samples were transported by the START-3 contractor to the EPA Region 6 Laboratory in Houston, Texas, for analysis.

START-3 collected a total of 15 surface soil samples including a background sample, and a duplicate from the primary IPMR facility and the warehouse location. The surface soil samples were analyzed for total RCRA metals, TCLP RCRA metals, and pH. The Total RCRA metals analysis were compared to the EPA Industrial Regional Screening Levels (RSLs), the TCLP RCRA metals were compared to the Texas Commission on Environmental Quality (TCEQ) TCLP regulatory levels, and the pH was compared to the EPA Characteristic Hazardous Waste Identification for corrosivity (D002). A review of Attachment E and F indicates that thallium, lead, copper, and chromium were detected above the EPA Industrial RSLs in the surface soil samples.

START-3 collected a total of three liquid samples at the warehouse location. The liquid samples were analyzed for total RCRA metals and pH. The total RCRA metals analyses were compared to the TCEQ TCLP regulatory levels, and the pH was compared to the EPA Characteristic Hazardous Waste Identification for corrosivity (D002). A review of the data (Attachment G) indicates that chromium, selenium, and silver were detected above the EPA Industrial RSLs, and the pH results indicated the liquid was an EPA characteristic hazardous waste.

Demobilization

After performing the response assessment activities, EPA and START-3 contractors demobilized from the site on 27 January 2012. This final report was prepared as part of the requirements of TDD No. TO-0001-12-01-03 and serves as documentation of work completed to date.

5. LIST OF ATTACHMENTS

A. Site Location Map

B. Site Area Map

C. Facility Location Site Sketch

D. Warehouse Locations Site Sketch

E. Soil Sample Analytical Results Summary

F. Soil Sample TCLP Analytical Results Summary

G. Liquid Sample Analytical Results Summary

H. Digital Photographs

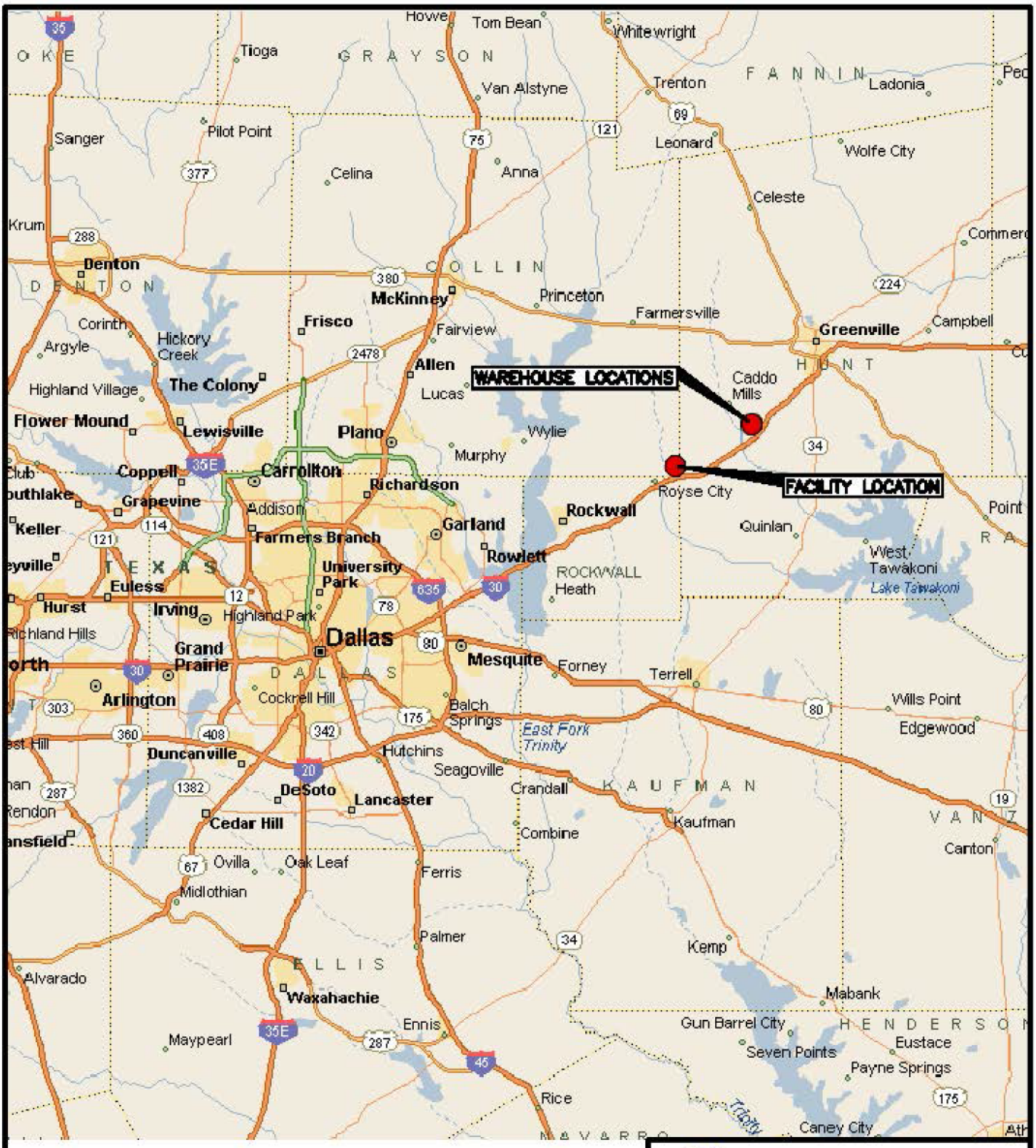
I. Pollution Report (POLREP)

J. START-3 Logbook

K. TDD No. TO-0001-12-01-03 and Amendments A - C

Attachment A

Site Location Map



SOURCE: MICROSOFT STREETS 2009.
TDD No.: TO-0001-12-01-03

US EPA REGION 6
START-3

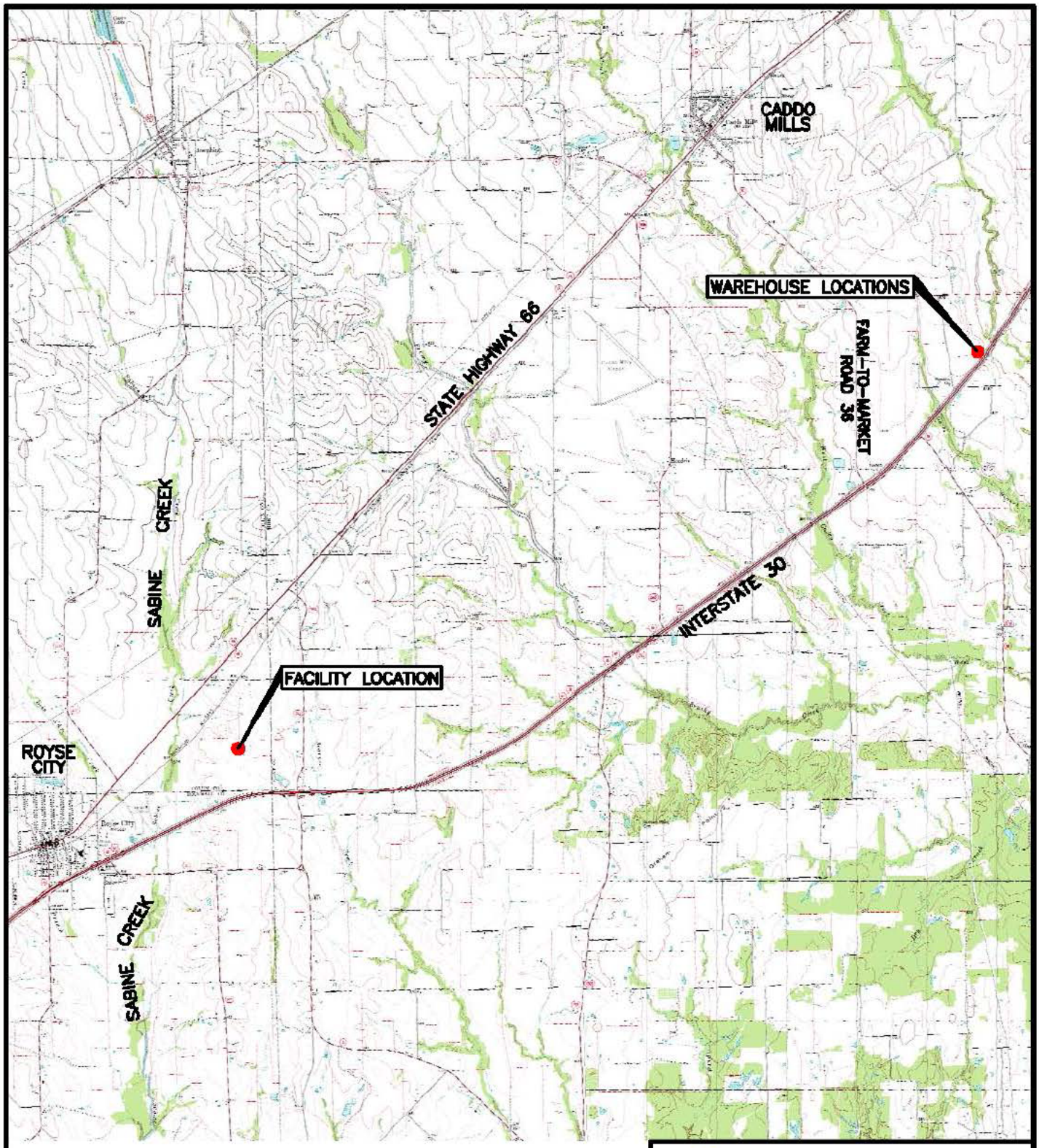
ATTACHMENT A
SITE LOCATION MAP
IPMR
ROYSE CITY, ROCKWALL COUNTY, TEXAS

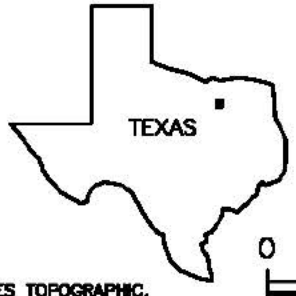
DATE:	W.O. #	SCALE:
JUL 2012	20406.012.001.0701.01	NOT TO SCALE

H:\START III EPA\0701_IPMR Royse City\D41B121217.dwg Jul 16, 2012 - 4:33pm

Attachment B

Site Area Map





N

0 0.625 1.25

SCALE IN MILES

SOURCE: USGS 7.5 MINUTE SERIES TOPOGRAPHIC, ROYCE CITY (1963), GREENVILLE SW (1962), QUINLAN (1979), AND JOSEPHINE (1963), TEXAS.
TDD No.: T0-0001-12-01-03

US EPA REGION 6
START-3

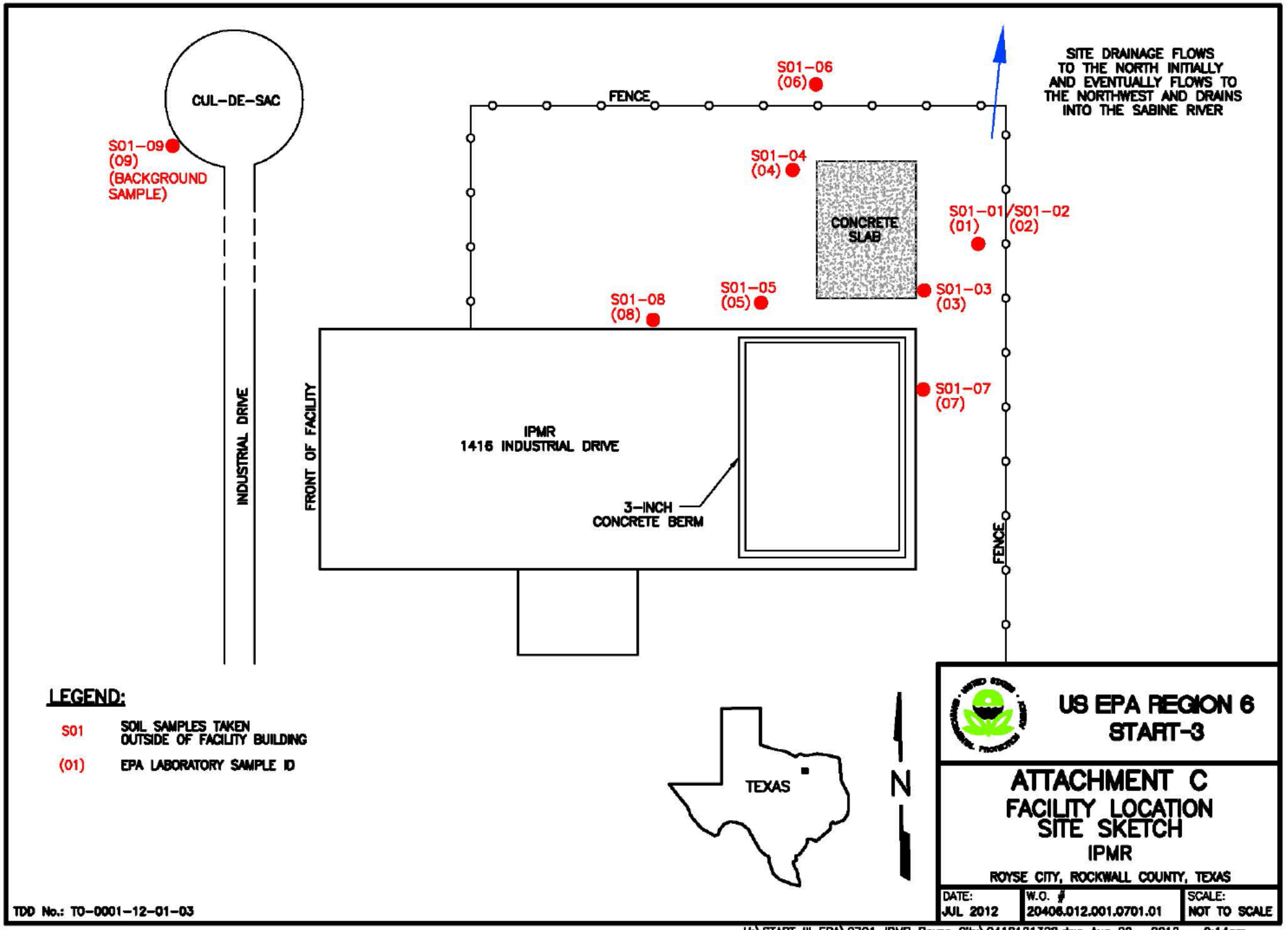
ATTACHMENT B
SITE AREA MAP
IPMR
ROYSE CITY, ROCKWALL COUNTY, TEXAS

DATE:	W.O. #	SCALE:
JUL 2012	20406.012.001.0701.01	AS SHOWN

H:\START III EPA\0701_IPMR Royse City\0418121111.dwg Jul 17, 2012 - 8:09am

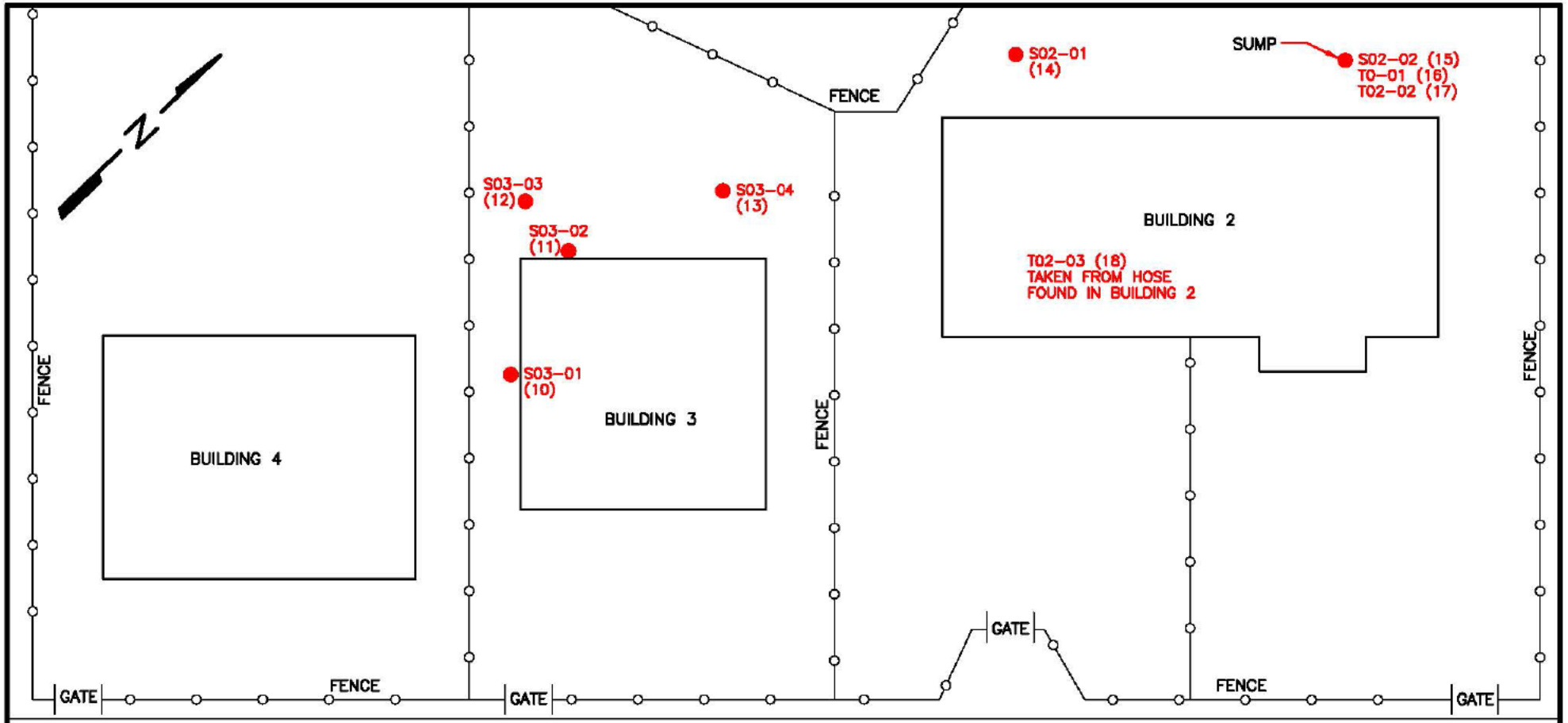
Attachment C

Facility Location Site Sketch


CUL-DE-SAC
S01-09
(09)
(BACKGROUND SAMPLE)
INDUSTRIAL DRIVE
FENCE
S01-06
(06)
SITE DRAINAGE FLOWS TO THE NORTH INITIALLY AND EVENTUALLY FLOWS TO THE NORTHWEST AND DRAINS INTO THE SABINE RIVER
S01-04
(04)
CONCRETE SLAB
S01-01/S01-02
(01) (02)
S01-05
(05)
S01-03
(03)
S01-08
(08)
FRONT OF FACILITY
IPMR
1416 INDUSTRIAL DRIVE
S01-07
(07)
3-INCH CONCRETE BERM
FENCE
LEGEND:
S01 SOIL SAMPLES TAKEN OUTSIDE OF FACILITY BUILDING
(01) EPA LABORATORY SAMPLE ID
TEXAS
N
US EPA REGION 6
START-3
ATTACHMENT C
FACILITY LOCATION
SITE SKETCH
IPMR
ROYSE CITY, ROCKWALL COUNTY, TEXAS
DATE: JUL 2012
W.O. # 20406.012.001.0701.01
SCALE: NOT TO SCALE
TDD No.: TO-0001-12-01-03
H:\START III EPA\0701_IPMR Royse City\0418121328.dwg Aug 29, 2012 - 9:14am

Attachment D

Warehouse Locations Site Sketch



LEGEND:

S02	SOIL SAMPLE TAKEN NEAR BUILDING 2
S03	SOIL SAMPLE TAKEN NEAR BUILDING 3
T02	LIQUID SAMPLE TAKEN NEAR BUILDING 2
(10)	EPA LABORATORY SAMPLE ID

US EPA REGION 6
START-3

ATTACHMENT D
WAREHOUSE LOCATIONS SITE SKETCH
IPMR

ROYSE CITY, ROCKWALL COUNTY, TEXAS

DATE:	W.O. #	SCALE:
JUL 2012	20406.012.001.0701.01	NOT TO SCALE

TDD No.: TO-0001-12-01-03

H:\START III EPA\0701_IPMR Royse City\0418121328.dwg Jul 17, 2012 - 8:05am

Attachment E

Soil Sample Analytical Results Summary

Attachment E - Soil Sample Analytical Results
IPMR, Royse City, Rockwall County, Texas

Analyte	Units	EPA Industrial RSL	ID Date Type	S01-01 01/27/12 Sample	S01-02 01/27/12 Duplicate	S01-03 01/27/12 Sample	S01-04 01/27/12 Sample	S01-05 01/27/12 Sample	S01-06 01/27/12 Sample	S01-07 01/27/12 Sample	S01-08 01/27/12 Sample
General											
% Solids	%	NP	--	**77.23**	**79.03**	**70.8**	**77.19**	**76.12**	**73.48**	**82.49**	**66.83**
pH	pH Units	NP	--	**7.9**	**7.9**	**7.7**	**8**	**7.2**	**8.1**	**3.9**	**7.4**
Metals											
Aluminum	mg/kg	990,000	--	**8,100**	**8,780**	**10,200**	**3,750**	**8,250**	**7,040**	**2,410**	**11,200**
Antimony	mg/kg	410	--	38.7 J, U	37.6 U	40.8 U	38 U	37.8 U	38.3 U	36.3 U	44.4 U
Arsenic	mg/kg	1.6	--	64.5 U	62.6 U	68 U	63.4 U	62.9 U	63.8 U	60.5 U	74.1 U
Barium	mg/kg	190,000	--	**91**	**333**	**274**	**45.6**	**108**	**69.8**	**46.5**	**307**
Beryllium	mg/kg	2,000	--	3.2 U	3.1 U	3.4 U	3.2 U	3.1 U	3.2 U	**7.8**	3.7 U
Cadmium	mg/kg	800	--	3.2 U	3.1 U	3.4 U	3.2 U	3.1 U	3.2 U	3 U	3.7 U
Calcium	mg/kg	NP	--	**65,800**	**36,200**	**19,100**	**12,700**	**31,700**	**41,300**	**18,300**	**34,000**
Chromium	mg/kg	1,500,000	--	**40.9**	**20.3**	**34.7**	**6.4**	**60**	**7.9**	**449**	**17.6**
Cobalt	mg/kg	300	--	**21.3**	**37.9**	**39.5**	12.7 U	**19.3**	12.8 U	**41.4**	**44**
Copper	mg/kg	41,000	--	**89.2 J**	**39.8**	**161**	**22.9**	**801**	**20.9**	**1,170**	**50.7**
Iron	mg/kg	720,000	--	**10,300**	**11,100**	**11,600**	**9,470**	**35,500**	**16,200**	**214,000**	**12,600**
Lead	mg/kg	800	--	19.3 J, U	**23.4**	**21.4**	19 U	**20**	19.1 U	**168**	**28.6**
Magnesium	mg/kg	NP	--	**2,230**	**1,660**	**1,620**	**910**	**5,050**	**1,780**	**476**	**1,740**
Manganese	mg/kg	23,000	--	**381**	**1,740**	**1,870**	**144**	**238**	**1,040**	**176**	**1,470**
Mercury	mg/kg	43	--	0.08 U	0.1 U	0.1 U	0.08 U	0.08 U	0.1 U	0.09 U	0.1 U
Nickel	mg/kg	20,000	--	**179 J**	**84**	**101**	**26.1**	**118**	**24.7**	**240**	**33.2**
Potassium	mg/kg	NP	--	**995**	**862**	**816**	**937**	**1,300**	**938**	**1,960**	741 U
Selenium	mg/kg	5,100	--	64.5 U	62.6 U	68 U	63.4 U	62.9 U	63.8 U	60.5 U	74.1 U
Silver	mg/kg	5,100	--	**14.6 J**	6.3 U	**15.2**	**12.8**	**81.1**	6.4 U	**146**	**8.4**
Sodium	mg/kg	NP	--	**376**	**314**	**477**	**342**	**703**	319 U	**2,850**	370 U
Thallium	mg/kg	10	--	64.5 J, L, U	62.6 L, U	68 L, U	63.4 L, U	62.9 L, U	63.8 L, U	**69.7 L**	74.1 L, U
Vanadium	mg/kg	5,200	--	**24**	**29.9**	**30.5**	12.7 U	**23.7**	**20**	**48.4**	**34**
Zinc	mg/kg	310,000	--	**535**	**190**	**407**	**198**	**800**	**389**	**5,250**	**1,440**

Notes:

EPA Industrial Regional Screening Levels (RSL's) are dated May 2012.
NP indicates not published.
Bold indicates a detected value.
Highlight indicates an exceedance of the EPA Industrial RSL's.

Qualifier definitions:
J indicates an estimated value
L indicates a low bias
U indicates nondetect at the associated concentration.

Attachment E - Soil Sample Analytical Results
IPMR, Royse City, Rockwall County, Texas

Analyte	Units	EPA Industrial RSL	ID Date Type	S01-09 01/27/12 Sample	S02-01 01/27/12 Sample	S02-02 01/27/12 Sample	S03-01 01/27/12 Sample	S03-02 01/27/12 Sample	S03-03 01/27/12 Sample	S03-04 01/27/12 Sample
General										
% Solids	%	NP	--	**65.8**	**66.48**	**66.23**	**75.57**	**69.49**	**78.75**	**46.6**
pH	pH Units	NP	--	**7.8**	**5.6**	**7.5**	**7.7**	**6.7**	**7.5**	**7.4**
Metals										
Aluminum	mg/kg	990,000	--	**13,400**	**6,810**	**10,200**	**4,650**	**4,270**	**4,500**	**7,800**
Antimony	mg/kg	410	--	44.6 U	42 U	43.1 U	37.5 U	39.9 J, U	37.5 U	63.6 U
Arsenic	mg/kg	1.6	--	74.4 U	70 U	71.8 U	62.5 U	66.5 U	62.5 U	106 U
Barium	mg/kg	190,000	--	**152**	**49.1**	**206**	**95.8**	**32.5**	**70.3**	**57.8**
Beryllium	mg/kg	2,000	--	3.7 U	3.5 U	3.6 U	3.1 U	3.3 U	3.1 U	**85.6**
Cadmium	mg/kg	800	--	3.7 U	3.5 U	3.6 U	**24.5**	**51.9**	3.1 U	5.3 U
Calcium	mg/kg	NP	--	**26,300**	**3,500**	**6,440**	**128,000**	**93,800**	**53,900**	**114,000**
Chromium	mg/kg	1,500,000	--	**42.1**	**7.7**	7.2 U	**413**	**72.7 J**	**25.5**	**734**
Cobalt	mg/kg	300	--	14.9 U	14 U	14.4 U	**592**	**1,090**	**146**	**1,200**
Copper	mg/kg	41,000	--	**50.1**	**969**	14.4 U	**5,800**	**20,400**	**568**	**44,300**
Iron	mg/kg	720,000	--	**31,200**	**8,290**	**6,750**	**26,400**	**6,060**	**5,100**	**8,380**
Lead	mg/kg	800	--	22.3 U	21 U	21.5 U	**1,770**	**50.5 J**	**337**	**543**
Magnesium	mg/kg	NP	--	**2,430**	**699**	**1,140**	**9,250**	**2,510**	**1,690**	**1,940**
Manganese	mg/kg	23,000	--	**549**	**102**	**205**	**275**	**158 J**	**139**	**216**
Mercury	mg/kg	43	--	0.1 U	0.1 U	0.1 U	**0.1**	0.09 J, U	0.08 U	0.1 U
Nickel	mg/kg	20,000	--	**25.8**	**80**	14.4 U	**2,790**	**1,430**	**1,210**	**10,500**
Potassium	mg/kg	NP	--	**1,780**	700 U	718 U	**670**	665 U	**766**	1060 U
Selenium	mg/kg	5,100	--	74.4 U	70 U	71.8 U	62.5 U	66.5 U	62.5 U	106 U
Silver	mg/kg	5,100	--	7.4 U	7 U	7.2 U	**132**	**7**	**10.6**	**61.4**
Sodium	mg/kg	NP	--	372 U	350 U	359 U	**11,000**	**2,480**	**3,340**	**1,050**
Thallium	mg/kg	10	--	74.4 L, U	70 L, U	71.8 L, U	**105 L**	66.5 J, L, U	62.5 L, U	106 L, U
Vanadium	mg/kg	5,200	--	**27.7**	**14.5**	**18.5**	**14**	13.3 U	12.5 U	21.2 U
Zinc	mg/kg	310,000	--	**53.5**	**1,490**	**42.4**	**12,500**	**6,400**	**4,040**	**63,000**

Notes:
EPA Industrial Regional Screening Levels (RSL's) are dated
NP indicates not published.
Bold indicates a detected value.
Highlight indicates an exceedance of the EPA Industrial RS

Qualifier definitions:
J indicates an estimated value
L indicates a low bias
U indicates nondetect at the associated concentration.

Attachment F

Soil Sample TCLP Analytical Results Summary

Attachment F - Soil Sample TCLP Analytical Results
IPMR, Royse City, Rockwall County, Texas

Analyte	Units	TCEQ TCLP Regulatory Levels	ID Date Type	S01-01 01/27/12 Sample	S01-02 01/27/12 Duplicate	S01-03 01/27/12 Sample	S01-04 01/27/12 Sample	S01-05 01/27/12 Sample	S01-06 01/27/12 Sample	S01-07 01/27/12 Sample	S01-08 01/27/12 Sample	S01-09 01/27/12 Sample
TCLP Metals												
Arsenic	mg/L	5	--	0.1 J, U	0.1 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
Barium	mg/L	100	--	**1.23**	**0.77**	**0.88**	**0.44**	**0.25**	**0.73**	**0.07**	**1.1**	**1.21**
Cadmium	mg/L	1	--	**0.03 J**	**0.01**	0.02 U	0.02 U	0.02 U	0.02 U	**0.04**	0.02 U	0.02 U
Chromium	mg/L	5	--	**0.04**	0.01 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U
Lead	mg/L	5	--	0.03 J, U	0.03 U	0.15 U	0.15 U	0.15 U	0.15 U	0.15 U	0.15 U	0.15 U
Mercury	mg/L	0.2	--	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	**0.000213**
Selenium	mg/L	1	--	0.1 U	0.1 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
Silver	mg/L	5	--	**0.04**	**0.02**	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U

Analyte	Units	TCEQ TCLP Regulatory Levels	ID Date Type	S02-01 01/27/12 Sample	S02-02 01/27/12 Sample	S03-01 01/27/12 Sample	S03-02 01/27/12 Sample	S03-03 01/27/12 Sample	S03-04 01/27/12 Sample
TCLP Metals									
Arsenic	mg/L	5	--	0.5 U	0.5 U	0.1 U	0.5 U	0.5 U	0.1 U
Barium	mg/L	100	--	**0.83**	**1.83**	**0.26**	**0.2**	**0.43**	**0.24**
Cadmium	mg/L	1	--	0.02 U	0.02 U	**0.74**	**0.95**	**0.06**	**0.06**
Chromium	mg/L	5	--	0.05 U	0.05 U	**2.35**	0.05 U	0.05 U	**5.82**
Lead	mg/L	5	--	0.15 U	0.15 U	**27.2**	**0.27**	**2.05**	**4.8**
Mercury	mg/L	0.2	--	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Selenium	mg/L	1	--	0.5 U	0.5 U	0.1 U	0.5 U	0.5 U	0.1 U
Silver	mg/L	5	--	0.05 U	0.05 U	**0.04**	0.05 U	0.05 U	**0.04**

Notes:
Bold indicates a detected value.
Highlight indicates an exceedance of the TCEQ TCLP Regulatory Level.
NP indicates not published.

Qualifier definitions:
J indicates an estimated value.
U indicates nondetect at the associated concentration.

Attachment G

Liquid Sample Analytical Results Summary

Attachment G - Liquid Sample Analytical Results
IPMR, Royse City, Rockwall County, Texas

Analyte	Units	TCEQ TCLP Regulatory Levels	ID Date Type	T02-01 01/27/12 Sample	T02-02 01/27/12 Duplicate	T02-03 01/27/12 Sample
General						
pH	pH Units	--	--	**7.36**	**7.29**	**-0.5**
Metals						
Aluminum	mg/L	NP	--	**548**	**401**	**126**
Antimony	mg/L	NP	--	0.3 J, U	0.3 U	6 U
Arsenic	mg/L	5	--	0.5 U	0.5 U	10 U
Barium	mg/L	100	--	**5.15 J**	**6.35**	**4.26**
Beryllium	mg/L	NP	--	**0.0423**	**0.0323**	0.5 U
Cadmium	mg/L	1	--	0.025 U	0.025 U	0.5 U
Calcium	mg/L	NP	--	**1,500**	**1,360**	**171**
Chromium	mg/L	5	--	**0.537**	**0.348**	**12.3**
Cobalt	mg/L	NP	--	**0.506**	**0.379**	**18.3**
Copper	mg/L	NP	--	**39.2**	**24.5**	**37,700**
Iron	mg/L	NP	--	**406**	**301**	**5,650**
Lead	mg/L	5	--	**3.59**	**2.41**	3 U
Magnesium	mg/L	NP	--	**71.5**	**63.3**	15 U
Manganese	mg/L	NP	--	**14.7**	**13.7**	**520**
Mercury	mg/L	0.2	--	**0.00149**	**0.00254**	0.0002 U
Nickel	mg/L	NP	--	**3.02**	**1.99**	**3820**
Potassium	mg/L	NP	--	**70.8**	**68.4**	100 U
Selenium	mg/L	1	--	0.5 U	0.5 U	**37.9**
Silver	mg/L	5	--	**0.543**	**0.319**	**17**
Sodium	mg/L	NP	--	**159**	**148**	**1,590**
Thallium	mg/L	NP	--	0.5 J, L, U	0.5 L, U	**406 L**
Vanadium	mg/L	NP	--	**0.902 J**	**0.671**	2 U
Zinc	mg/L	NP	--	**27.3**	**15.9**	**8,500**

Notes:
Bold indicates a detected value.
Yellow Highlight indicates an exceedance of the TCEQ TCLP Regulatorly Level.
Green Highlight indicates a characteristic hazardous waste for corrosivity (D002).
NP indicates not published.
Qualifier definitions:
J indicates an estimated value.
L indicates a low bias.
U indicates nondetect at the associated concentration.

Event Name: IPMR
Incident Name: IPMR
Photo Name: 001.JPG
Photo Type:
Direction: NE
Date/Time: Jan 27 2012 10:47AM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Northeast corner of facility building with standing water on floor

Event Name: IPMR
Incident Name: IPMR
Photo Name: 002.JPG
Photo Type:
Direction: SE
Date/Time: Jan 27 2012 10:48AM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Southeast corner of facility building with standing water on floor

Event Name: IPMR
Incident Name: IPMR
Photo Name: 003.JPG
Photo Type:
Direction: NE
Date/Time: Jan 27 2012 10:49AM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Central portion of facility building on north side

Event Name: IPMR
Incident Name: IPMR
Photo Name: 004.JPG
Photo Type:
Direction: E
Date/Time: Jan 27 2012 10:50AM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Central portion of facility building on south side.

Event Name: IPMR
Incident Name: IPMR
Photo Name: 005.JPG
Photo Type:
Direction: NE
Date/Time: Jan 27 2012 11:44AM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Front of facility and office bulding

Event Name: IPMR
Incident Name: IPMR
Photo Name: 006.JPG
Photo Type:
Direction: N
Date/Time: Jan 27 2012 11:45AM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Office within facility building

Event Name: IPMR
Incident Name: IPMR
Photo Name: 007.JPG
Photo Type:
Direction: N
Date/Time: Jan 27 2012 11:48AM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Central portion of facility building on the north side

Event Name: IPMR
Incident Name: IPMR
Photo Name: 008.JPG
Photo Type:
Direction: N
Date/Time: Jan 27 2012 11:52AM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Central portion of facility taken from doorway

Event Name: IPMR
Incident Name: IPMR
Photo Name: 009.JPG
Photo Type:
Direction: NE
Date/Time: Jan 27 2012 11:52AM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Central portion of facility on south side

Event Name: IPMR
Incident Name: IPMR
Photo Name: 010.JPG
Photo Type:
Direction: S
Date/Time: Jan 27 2012 12:10PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: (b) (7)(C) collecting sample S01-01

Event Name: IPMR
Incident Name: IPMR
Photo Name: 011.JPG
Photo Type:
Direction:
Date/Time: Jan 27 2012 1:09PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Location of S01-01 and S01-02

Event Name: IPMR
Incident Name: IPMR
Photo Name: 012.JPG
Photo Type:
Direction: D
Date/Time: Jan 27 2012 1:10PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Sample containers for S01-01 and S01-02

Event Name: IPMR
Incident Name: IPMR
Photo Name: 013.JPG
Photo Type:
Direction: D
Date/Time: Jan 27 2012 1:11PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Sample containers for S01-01 and S01-02

Event Name: IPMR
Incident Name: IPMR
Photo Name: 014.JPG
Photo Type:
Direction: SW
Date/Time: Jan 27 2012 1:12PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Sample location for S01-03

Event Name: IPMR
Incident Name: IPMR
Photo Name: 015.JPG
Photo Type:
Direction: D
Date/Time: Jan 27 2012 1:13PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Sample containers for S01-03

Event Name: IPMR
Incident Name: IPMR
Photo Name: 016.JPG
Photo Type:
Direction: SW
Date/Time: Jan 27 2012 1:14PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Sample location for S01-08

Event Name: IPMR
Incident Name: IPMR
Photo Name: 017.JPG
Photo Type:
Direction: SW
Date/Time: Jan 27 2012 1:15PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: (b) (7)(C) taking pH of standing liquid in drainage area

Event Name: IPMR
Incident Name: IPMR
Photo Name: 018.JPG
Photo Type:
Direction: SE
Date/Time: Jan 27 2012 1:16PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Sample location for S01-05

Event Name: IPMR
Incident Name: IPMR
Photo Name: 019.JPG
Photo Type:
Direction: D
Date/Time: Jan 27 2012 1:17PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Sample containers at location S01-04

Event Name: IPMR
Incident Name: IPMR
Photo Name: 020.JPG
Photo Type:
Direction: SW
Date/Time: Jan 27 2012 1:36PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Sample location for S01-06

Event Name: IPMR
Incident Name: IPMR
Photo Name: 021.JPG
Photo Type:
Direction: D
Date/Time: Jan 27 2012 1:37PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Sample containers at location S01-06

Event Name: IPMR
Incident Name: IPMR
Photo Name: 022.JPG
Photo Type:
Direction: D
Date/Time: Jan 27 2012 2:32PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: pH strip showing pH of 5 from liquid on ground in drainage pathway

Event Name: IPMR
Incident Name: IPMR
Photo Name: 023.JPG
Photo Type:
Direction: SW
Date/Time: Jan 27 2012 2:32PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Sample location S01-08. Notice corrision on north side of building

Event Name: IPMR
Incident Name: IPMR
Photo Name: 024.JPG
Photo Type:
Direction:
Date/Time: Jan 27 2012 2:42PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Sample location S01-08 showing northside of building and sample containers

Event Name: IPMR
Incident Name: IPMR
Photo Name: 025.JPG
Photo Type:
Direction: D
Date/Time: Jan 27 2012 2:43PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Sample containers at location S01-08

Event Name: IPMR
Incident Name: IPMR
Photo Name: 026.JPG
Photo Type:
Direction: NE
Date/Time: Jan 27 2012 2:44PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: View of property on north side of building showing fence and red coloring in runoff areas

Event Name: IPMR
Incident Name: IPMR
Photo Name: 027.JPG
Photo Type:
Direction: SW
Date/Time: Jan 27 2012 2:55PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Sample jars at sample location S01-07

Event Name: IPMR
Incident Name: IPMR
Photo Name: 028.JPG
Photo Type:
Direction: D
Date/Time: Jan 27 2012 2:56PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Sample jars at sample location S01-07

Event Name:	IPMR
Incident Name:	IPMR
Photo Name:	029.JPG
Photo Type:	
Direction:	D
Date/Time:	Jan 27 2012 2:57PM
Latitude:	
Longitude:	
Photographer:	(b) (7)(C)
Witness:	(b) (7)(C)
Caption:	pH strip indicating pH of liquid from back room on east side of property. pH paper indicates pH betwen 1 and 2.

Event Name: IPMR
Incident Name: IPMR
Photo Name: 030.JPG
Photo Type:
Direction: E
Date/Time: Jan 27 2012 2:58PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: standing liquid in back room on east side of property

Event Name: IPMR
Incident Name: IPMR
Photo Name: 031.JPG
Photo Type:
Direction: E
Date/Time: Jan 27 2012 2:59PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Back room on east side of property showing concrete curbing

Event Name: IPMR
Incident Name: IPMR
Photo Name: 032.JPG
Photo Type:
Direction: E
Date/Time: Jan 27 2012 3:00PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Back room on east side of property showing concrete curbing

Event Name: IPMR
Incident Name: IPMR
Photo Name: 033.JPG
Photo Type:
Direction: W
Date/Time: Jan 27 2012 3:01PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: 60 gallon tubs containing liquid and sludge like material

Event Name: IPMR
Incident Name: IPMR
Photo Name: 034.JPG
Photo Type:
Direction: W
Date/Time: Jan 27 2012 3:02PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: taking pH of sludge in 60 gallon tub

Event Name: IPMR
Incident Name: IPMR
Photo Name: 035.JPG
Photo Type:
Direction: W
Date/Time: Jan 27 2012 3:03PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: pH of sludge in 60 gallon tub - Low pH less than 2

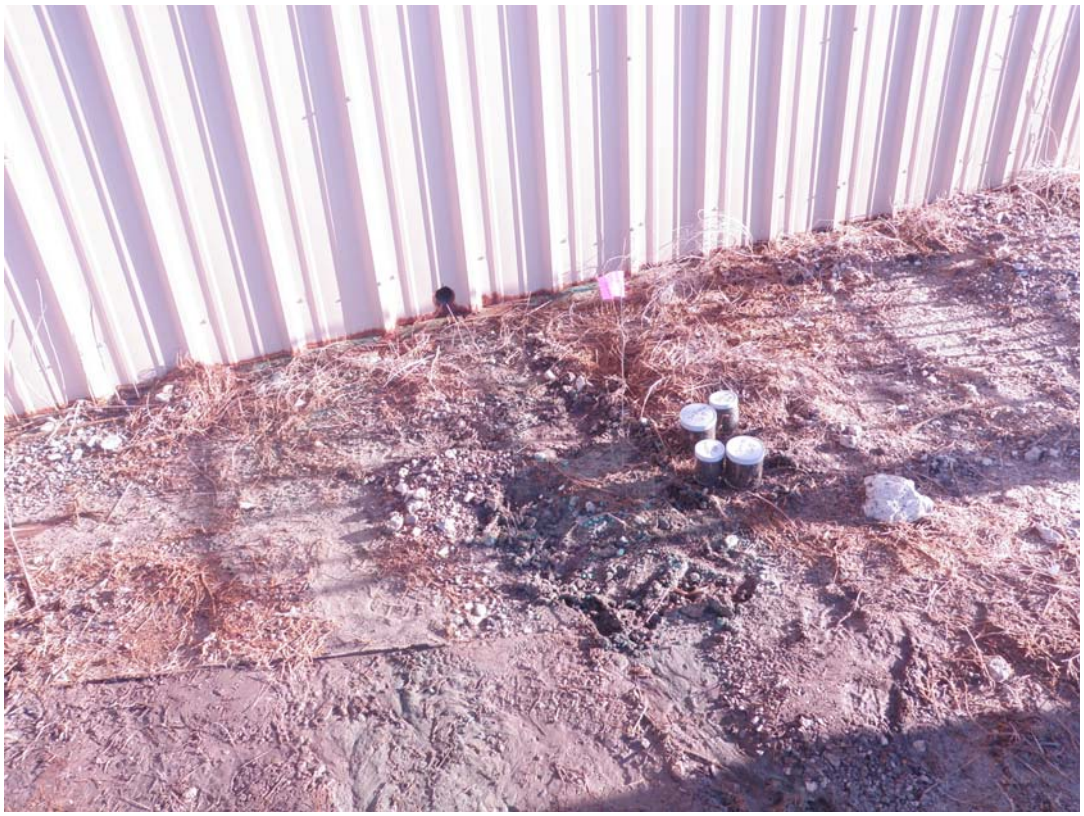
Event Name: IPMR
Incident Name: IPMR
Photo Name: 036.JPG
Photo Type:
Direction: W
Date/Time: Jan 27 2012 3:04PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: pH of liquid in gallon tub. pH is less than 2.

Event Name: IPMR
Incident Name: IPMR
Photo Name: 037.JPG
Photo Type:
Direction: SW
Date/Time: Jan 27 2012 3:05PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: tubs, drum and cylinders in central room in facility

Event Name: IPMR
Incident Name: IPMR
Photo Name: 038.JPG
Photo Type:
Direction: SW
Date/Time: Jan 27 2012 3:06PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: drums, cylinders, and fork lift in central room

Event Name: IPMR
Incident Name: IPMR
Photo Name: 039.JPG
Photo Type:
Direction: NE
Date/Time: Jan 27 2012 4:20PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Sample jars at sample location S03-01 at building 3

Event Name: IPMR
Incident Name: IPMR
Photo Name: 040.JPG
Photo Type:
Direction: E
Date/Time: Jan 27 2012 4:21PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Sample jars at sample location S03-01 at building 3



Event Name: IPMR
Incident Name: IPMR
Photo Name: 041.JPG
Photo Type:
Direction: S
Date/Time: Jan 27 2012 4:22PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Sample jars at sample location S03-02 at building 3

Event Name: IPMR
Incident Name: IPMR
Photo Name: 042.JPG
Photo Type:
Direction: SE
Date/Time: Jan 27 2012 4:23PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Sample jars at sample location S03-02 at building 3

Event Name: IPMR
Incident Name: IPMR
Photo Name: 043.JPG
Photo Type:
Direction: NW
Date/Time: Jan 27 2012 4:24PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Sample jars at sample location S03-03 behind building 3

Event Name: IPMR
Incident Name: IPMR
Photo Name: 044.JPG
Photo Type:
Direction: SE
Date/Time: Jan 27 2012 4:24PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Sample jars at sample location S03-03 behind building 3

Event Name: IPMR
Incident Name: IPMR
Photo Name: 045.JPG
Photo Type:
Direction: D
Date/Time: Jan 27 2012 4:25PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Sample jars at sample location S03-03 behind building 3

Event Name: IPMR
Incident Name: IPMR
Photo Name: 046.JPG
Photo Type:
Direction: N
Date/Time: Jan 27 2012 4:26PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Sample jars at sample location S03-04 behind building 3

Event Name: IPMR
Incident Name: IPMR
Photo Name: 047.JPG
Photo Type:
Direction: D
Date/Time: Jan 27 2012 4:27PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Sample jars at sample location S03-04 behind building 3

Event Name: IPMR
Incident Name: IPMR
Photo Name: 048.JPG
Photo Type:
Direction: D
Date/Time: Jan 27 2012 4:53PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: pH taken of liquid in blue-green kid pool. pH is less than 2.

Event Name: IPMR
Incident Name: IPMR
Photo Name: 049.JPG
Photo Type:
Direction: N
Date/Time: Jan 27 2012 4:57PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: blue green pool with minor amount of liquid

Event Name: IPMR
Incident Name: IPMR
Photo Name: 050.JPG
Photo Type:
Direction: D
Date/Time: Jan 27 2012 4:58PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: pH taken of liquid on floor at west end of building 2

Event Name: IPMR
Incident Name: IPMR
Photo Name: 051.JPG
Photo Type:
Direction: D
Date/Time: Jan 27 2012 4:58PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: liquid on floor on west end of building 2

Event Name: IPMR
Incident Name: IPMR
Photo Name: 052.JPG
Photo Type:
Direction: NE
Date/Time: Jan 27 2012 5:00PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: sludge found in drums on north end of building 2

Event Name: IPMR
Incident Name: IPMR
Photo Name: 053.JPG
Photo Type:
Direction: SE
Date/Time: Jan 27 2012 5:14PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Sample jars at sample location S02-01

Event Name: IPMR
Incident Name: IPMR
Photo Name: 054.JPG
Photo Type:
Direction: D
Date/Time: Jan 27 2012 5:15PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Sample jars at sample location S02-01

Event Name: IPMR
Incident Name: IPMR
Photo Name: 055.JPG
Photo Type:
Direction: SE
Date/Time: Jan 27 2012 5:56PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Sample jars and bottles at sample locations, S02-02, T02-01, and T02-02

Event Name: IPMR
Incident Name: IPMR
Photo Name: 056.JPG
Photo Type:
Direction: D
Date/Time: Jan 27 2012 5:56PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Sample jars at location S02-02

Event Name: IPMR
Incident Name: IPMR
Photo Name: 057.JPG
Photo Type:
Direction: D
Date/Time: Jan 27 2012 5:57PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Sample bottles at location T02-01 and T02-02

Event Name: IPMR
Incident Name: IPMR
Photo Name: 058.JPG
Photo Type:
Direction: NE
Date/Time: Jan 27 2012 6:10PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Overview of Building 2

Event Name: IPMR
Incident Name: IPMR
Photo Name: 059.JPG
Photo Type:
Direction: E
Date/Time: Jan 27 2012 6:11PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Overview of Building 2

Event Name: IPMR
Incident Name: IPMR
Photo Name: 060.JPG
Photo Type:
Direction: W
Date/Time: Jan 27 2012 6:12PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Overview of Buildng 2

Event Name: IPMR
Incident Name: IPMR
Photo Name: 061.JPG
Photo Type:
Direction: NW
Date/Time: Jan 27 2012 6:13PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Hose found in Building 2

Event Name: IPMR
Incident Name: IPMR
Photo Name: 062.JPG
Photo Type:
Direction: NE
Date/Time: Jan 27 2012 6:14PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Overview of Building 2

Event Name: IPMR
Incident Name: IPMR
Photo Name: 063.JPG
Photo Type:
Direction: W
Date/Time: Jan 27 2012 6:15PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Overview of Building 2

Event Name: IPMR
Incident Name: IPMR
Photo Name: 064.JPG
Photo Type:
Direction: NE
Date/Time: Jan 27 2012 6:16PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Overview of Building 2

Event Name: IPMR
Incident Name: IPMR
Photo Name: 065.JPG
Photo Type:
Direction: N
Date/Time: Jan 27 2012 6:17PM
Latitude:
Longitude:
Photographer: (b) (7)(C)
Witness: (b) (7)(C)
Caption: Crate found in north side of building 2

<< >

Attachment I

Pollution Report (POLREP)

Please contact the EPA OSC for a copy of the POLREP.

ATTACHMENT J

START-3 LOGBOOK

"Rite in the Rain"®
ALL-WEATHER
JOURNAL
No. 391

IPMR Assessment
TDD: TO-0001-12-01-03
WO # 20906.012.001.0701.01

"Rite in the Rain"®
ALL-WEATHER WRITING PAPER

Nam (b) (7)(C)

Address 3900 Dallas Pkwy Suite 1750
Plano Tx 75093

Phon (b) (7)(C)

Project IPMR Assessment
TO-0001-12-01-03
WO# 20406.012.001.0701.01

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1/24/12 TO-0001-12-01-03

(b) (7)(C)

CONTENTS

PAGE	REFERENCE	DATE

Coordinates: office
32.98721, -96.30295
Warehouse:
33.03481, -96.18833

Equipment:
Tier 1 Kit
Air Kit
Drager kit
TVA-1000 - B27040
Rad kit
Lumex 915+ B27058

Air Kit - VRae 551164, Drager PAC III B27055
VRae 551162
VRae 551163
Drager kit - Drager Quantimeter 541222
Tier 1 - MultiRae Plus 551167
Rad kit ~~AD241-2~~ - A87717
~~AD192~~ - B27021

1424 OSC Adams contacted START [redacted] to respond in conjuction with the EPA CID to a metal recovery facility called Industrial Precious Metal Recovery Inc. (IPMR), located at 1416 Industrial Drive in Royse City Texas 75189. OSC Adams does not have any additional information at this time, but has meetings schedu[redacted] with CID agent [redacted] and will know more information after that time.

[redacted]

1000 START [redacted] departed START office with START [redacted] (TR) to pick up equipment for assessment from EPA WHSE. Equipment includes Air kit (S7122?) Drager kit, (B27070) TVA-1000 #A87117 (B2708) Radiation kit, + Lumex 915+ (B27055)

1?47 START [redacted] spoke to OSC Adams potential for Level B work with opening drums. OSC Adams also stated he would like to use the EPA Lab in Houston if possible instead of contracting a lab through START. Current analysis includes Total RCRA metals & pH. May also include TCLP RCRA Metals but to be determined on TCLP RCRA Metals. OSC Adams stated he had meeting at 1500 today & would know more details at that time.

[redacted] + START [redacted] spoke to OSC Adams to discuss site planning & staffing. OSC Adams stated CID [redacted] anticipating no more

(b) (7)(C)

than 30 samples combined between soil + unknown materials. OSC Adams stated that ~~we~~ START will be collecting the samples for CID + analysis will include Total metals * (RCRA metals including mercury) + pH.) OSC Adams stated that (b) (7)(E)

(b) (7)(E)

(b) (7)(E)

. At present ~~with OSC Adams~~ OSC Adams has agreed to 4 ~~START~~ personel onsite, + if necessary OSC Adams will Assist in providing backup for Level B Activities. At present OSC Adams has requested START provide a QASP + has forwarded some information from CID to be included as an attachment for QASP. OSC Adams, + START are continuing to work through requirements for providing samples to the EPA Lab in'

(b) (7)(C)

1/25/12

(b) (7)(C)

Houston. OSC Adams also stated for START to be prepared to mobilize + to be near the site in Royse City at approx. 0900.

(b) (7)(C)

(b) (7)(C)

0838 OSC Adams contacted START (b) (7)(C) to complete final planning of site activities. At this time OSC Adams agreed on site personel which are as follows:

START (b) (7)(C) - FTL
START - AFTL + FSD
START ds - Team Member
START Data Management

for Scribe, + assistance in sample processing. Planning [illegible] as follows: START (b) (7)(C) [illegible] is working on the QASP, START (b) (7)(C) is working on getting sample media, START (b) (7)(C) is working on coordination + planning with OSC Adams. START (b) (7)(C) is working on preparations for sample data input into Scribe. During this meeting OSC Adams agreed to the START bringing HAZMAT Trailer [illegible] in case it is

(b) (7)(C)

(b) (7)(C)

needed for additional supplies. 1023 OSC Adams forwarded information from CID (b) (7)(C) to START (b) (7)(C) stating START does not have to do a drum inventory at this time. 1306 START (b) (7)(C) + START (b) (7)(C) confirmed with OSC Adams what analysis will be run on samples for QASP. This will include TCLP metals, Total Metals, + pH. OSC Adams also stated all data will be turned over to CID + at this time START will not receive this data. 1413 START (b) (7)(C) communicated with OSC Adams at which time OSC Adams stated we would also ~~be~~ be taking the MCP + agreed to allow a rental vehicle for (b) (7)(C) to use + to possibly transport samples to Houston Lab. 1030 (Late Entry) START (b) (7)(C) picked up Rad kit from

(b) (7)(C)

8 1/26/12 TO-0001-12-01-03

(b) (7)(C)

EPA WISE to assist with site assessment activities,
1413 OSC Adams forwarded START (b) (7)(C) address of where to meet in Royse City & stated for START to be there by, between 0830-0845.

(b) (7)(C)

1/27/12 TO-0001-12-01-03 9

(b) (7)(C)

H+S Meeting
Objective: Perform initial site assessment, document site conditions, perform air monitoring, perform sampling of drums/totes/containers, as needed, + perform HAZCATTING of unknowns + other technical support as directed by the EPA OSC.
Hazards:
Biological: BBP, Stray Animals
Chemical: HCl, HNO_3, Chrome III Chromic Acid, Mercury as well as other chemicals of concern.
Physical: Slips, Trips, + Falls related to site organization, + potential rough terrain, Cold Stress, Heat Stress due to possible Level C + B work, + Traffic. Site security ast also may be an issue.
Radiation: Potential concern due to unknown nature of work activity at site.
PPE: Initial in Level

(b) (7)(C)

1/27/12

 [redacted]/12 TO-0001-12-01-03

PQ H&S Continued
Potential to upgrade to Level B.
will downgrade as conditions

[redacted]

hospital and directions
0630 START [redacted] arrives at office to load equipment
0700 START [redacted] arrives at WHSE to pick up HAZMAT Trailer & met START [redacted] + get MCP
0715 START [redacted] [redacted] depart to EPA WHSE
0730 START [redacted] [redacted] arrives at [redacted] + meet START [redacted] 3) + OSC Adam Adams
[redacted] 1/27/12

1/27/12 [redacted] TO-0001-12-01-03

0345 START Morning H&S Briefing for specific info see page 9 + page 10 of logbook
Weather - Clear Skies, Current in 40's, High in mid 60's.

[redacted]

0858 Morning Ops briefing with CID Agent [redacted] OSC Adams & START will hang back until given word by Agent [redacted] DS.
Morning Safety Meeting with CID +

[redacted]

1010 START-3 arrives onsite & begin preparing to make site entry site
[redacted] 1/27/12

(b) (7)(C) assessment after EPA CID (b) (7)(C) + his men secured the site.

(b) (7)(C)

+ START (b) (7)(C) take preparations of air monitoring equipment including Tier I MultiRae, Air kit VRae's, + Rad, Radiation equipment including Ludlum Robot, model 192 + model ~~2241~~ 2241. Radiation background is 5uR/hr. ~~X~~ START (b) (7)(C) is also setting up PCP ~~+ getting~~ re for sample processing documentation later. Background of air monitoring equipment prior to entry is zero. Sensors on equipment include Cl_2, SO_2, pH, NO, NH_3, HCN, LEL H_2S, LEL, O_2 1035 START (b) (7)(C) gather equipment for air monitoring + Radiation survey, + ~~make~~ begin initial site assessment with CID personel. Observations include observing drums with Nitric Acid, He, HCl labels on them. During assessment owner describes process which includes mixture of Nitric + HCl Acid called Aqua Regia, the use of Sodium Sulfide + Zinc Powder, + Lyme

(b) (7)(C) 1/27/12

(b) (7)(C) which is used to neutralize ~~product~~ on acidic residue after process. Chlorine readings were 0.6 ppm in central room near plastic to tee + 7.1 ppm Cl in back room which is farthest east on in Rebuilding. There is also a lip to ~~the backroom~~ surrounding the backroom on the concrete slab which will allow standing water to collect in backroom on slab. On the northeast portion of the backroom there is a large poly tank which owners states was going to be ~~was~~ used as part of a ventilation system owner + associates were going to build. Owner stated he planned to cut a door in the tank which would allow personel to walk inside.

1055 START (b) (7)(C) + OSC Adams depart to other WHSE's with CID to conduct air monitoring for personel Health + Safety. START (b) (7)(C) prepare to sample for soil samples. Sample ~~nomenclature~~ nomenclature is as

(b) (7)(C) 1/27/12

(b) (7)(C)

follows. SO1-01, SO1-02, SO1-03, etc. SO1 indicates soil sample at building 1.

1156 START (b) (7)(C) collect SO1-01 & SO1-02 which is duplicate of SO1-01. Recorded 1159 for SO1-02 to not have same time on Chain of Custody. In this area, there is red staining on the ground

1238 START (b) (7)(C) collects SO1-03 in drainage channel on north side of facility near exterior concrete slab.

1245 START (b) (7)(C) collects SO1-05

1246 START (b) (7)(C) collects SO1-04

1338 START (b) (7)(C) collects SO1-06 which is the MS/MSD sample volume.

Site sketch at Building 1.

(b) (7)(C)

1/27/12

1/27/12

(b) (7)(C)

1230 (LE Late Entry) DSL Adams + START (b) (7)(C) return from air monitoring of the Warehouses. with same qid monitoring instruments used at primary building. No readings were above background.

1345 START (b) (7)(C) takes pH of liquid in drainage channel on north side of building where heavy corrosion on north side of building has occurred. this is also SO1-08 Sample location. pH in this area is 5.

1429 START (b) (7)(C) collects SO1-07.

1437 START (b) (7)(C) collects SO1-08.

1445 START (b) (7)(C) takes pH on northwest side of property within fence. pH is 6.

1455 START (b) (7)(C) takes pH of liquid standing in back room which is surrounded by lip on concrete. pH is 2.

1500 START (b) (7)(C) takes pH of liquid in black tubs in mid area of building. pH is 2 or less.

(b) (7)(C)

1/27/12

16 1/27/12 TO-0001-12-01-03

(b) (7)(C)

1515 OSC Adams + START depart for other WHSE. START (b) (7)(C) (b) (7)(C) continues processing samples in MCP.

1525 START + OSC Adams arrive at WHSE in (b) (7)(C) + assess buildings with Agent (b) (7)(C) Potentially find 2 samples but Agent (b) (7)(C) (b) (7)(E) building 2 which is the building furthest east. So TO not be in way START + OSC Adams move over to Building 3 + collect samples of specific colored materials that are on ground as requested by agent (b) (7)(C) (b) (7)(E) by Agent (b) (7)(C) (b) (7)(E) 3 where samples are to be collected. Building 3 is designated 503. START + OSC Adams divide up to collect samples.

1610 START (b) (7)(C) collects 503-02

1613 START collects 503-01

1615 START collects 503-03

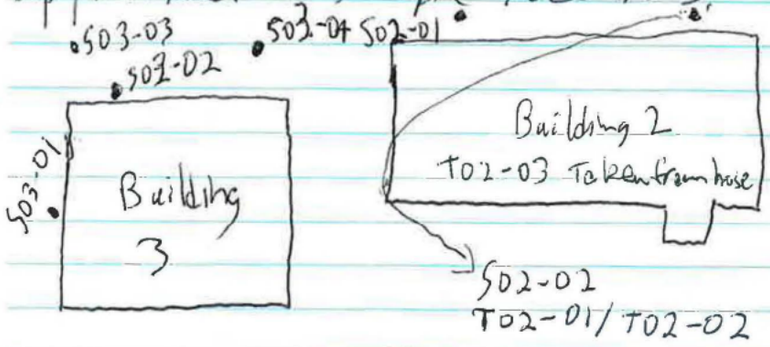
1620 OSC Adams collects 503-04

(b) (7)(C) 1/27/12

1/27/12 TO-0001-12-01-03 17

(b) (7)(C)

1625 Site Sketch for Building 3 + 2 approximate sample locations.



1635 START + OSC Adams move over to Building 2: Building 2 samples for soil designated 502.

1653 START (b) (7)(C) takes pH of liquid in blue plastic pool. pH is 0.

1658 START (b) (7)(C) takes pH of Blue green liquid on floor west end of Building 2. pH is less than 2.

1658 START (b) (7)(C) collecting 502-01 behind at Building 2 on west side.

1720 START to collect liquid sample which will be designated TO2 for Building 2.

(b) (7)(C) 1/27/12

(b) (7)(C)

1725 START (b) (7)(C) collecting a liquid sample called TO2-01 at depth of liquid approximately 3 foot below surface which is suspected to be a septic Tank. START (b) (7)(C) + (b) (7)(C) also collecting a duplicate called TO2-02 which is a dup of TO2-01.

1745 START (b) (7)(C) collecting SO2-02 which is soil on west side of the mouth of area where liquid samples ~~SO~~ TO2-01 + TO2-02 were collected.

1745 CID agents collected TO2-03 from a hose that had liquid contents + is thought to be a discharge hose by CID agents.

1830 After completing assessment + taking photos of ~~inside building~~ inside building 2, START (b) (7)(C) depart WHSE's for MCP to process samples. START did not go into or around Building 4 which is building furthest west to collect samples of photo document.

(b) (7)(C) 1/27/12

(b) (7)(C)

1840 START (b) (7)(C) + OSC Adams arrive at MCP that is set up near building 1.

1845 START (b) (7)(C) collect background sample on the west side of Cul-de-Sac on Industrial Drive. START (b) (7)(C) + (b) (7)(C) are processing samples.

2125 START completes processing samples + departs site.

2245 START (b) (7)(C) arrive at EPA WHSE ~~with~~ to drop off HAZMAT Trailer + monitoring equipment which was left in the MCP. START (b) (7)(C) who drove the MCP is already at the WHSE ~~parking~~ parking the MCP.

2315 START RL departs WHSE. START (b) (7)(C) move samples over to coolers + seal up samples in coolers with ICE + put COC seals on coolers.

2355 START (b) (7)(C) continuing to repack samples in coolers with ICE. Samples will be stored in MCP which is ~~locked~~ locked + locked ward outside of EPA WHSE over weekend.

(b) (7)(C)

1/22/12

TO-0001-12-01-03

(b) (7)(C) 0015 START (b) (7)(C) + START (b) (7)(C) depart WHSE for night.

1330 START (b) (7)(C) contacts OSC Adams + arranges to meet OSC Adams at 1430 ~~1430~~ at WHSE yard to check on samples + add ice to the samples.

1400 START (b) (7)(C) picks up ICE for samples.

1430 START (b) (7)(C) arrives at WHSE yard + meets OSC Adams at MCP.

1435 START (b) (7)(C) opens MCP + observes that samples in the MCP have not been disturbed. START (b) (7)(C) proceeds to open coolers with samples + re ices samples. Prior COC seals were intact.

1545 START (b) (7)(C) completes reicing samples + retapes + places new COC ~~for~~ seals on coolers.

1510 (Late Entry) START (b) (7)(C) + OSC Adams discuss ~~draft~~ drafting POLREP. OSC Adams requested START (b) (7)(C) draft a polrep by 0800 on 1/30/12.

1605 START (b) (7)(C) departs WHSE

(b) (7)(C)

1/29/12

TO-0001-12-01-0321

(b) (7)(C)

1620 START (b) (7)(C) arrives at home + begins getting information organized for POLREP.

1510 (Late Entry) START (b) (7)(C) + OSC Adams also discusses who will drive samples to Houston Lab on 1/30/12. At present time OSC Adams has tasked START to drive samples down to Houston Lab, but may change his mind.

(b) (7)(C)

 1/29/12 TO-0001-12-01-03

[redacted]

~~START~~ 1445 START [redacted] departs home for EPA WHSE yard.

1500 START [redacted] arrives at EPA WHSE yard to check on samples in MCP. START [redacted] observes that samples have not been disturbed + COC seals are still intact.

1510 START [redacted] proceeds to open ~~at~~ coolers + adds ice to coolers.

1600 START [redacted] completes repacking coolers, reseals + ~~re COC~~ places new COCs on coolers.

1615 START [redacted] departs WHSE yards.

~~213~~ 2130 START [redacted] begins drafting POLREP.

2330 ~~STA~~ START [redacted] completes drafting POLREP

[redacted]

1/30/12 TO-0001-12-01-03

[redacted]

0800 START [redacted] arrives at EPA WHSE yard. START [redacted] waiting.

0810 START [redacted] observes that sample coolers ~~has~~ have COC labels intact and are in the MCP which ~~is to~~ was locked prior to START [redacted] opening.

0820 START [redacted] + START [redacted] open coolers + repack with ICE.

0905 START [redacted] signs samples over to START [redacted] + reseals coolers with new COC seals.

0930 ~~STA~~ START [redacted] departs for EPA Houston Lab with samples

1430 START [redacted] reports to START [redacted] that samples have been delivered to EPA Houston Lab.

1930 START [redacted] reports that he has arrived back at his home in Dallas.

[redacted]

11/30/12 (b) (7)(C)

TO-0001-12-01-03

photolog TPMR Assessment

Location Royce City TX, Caddo Mills TX

photographers: (b) (7)(C)

(b) (7)(C)

ID	Date	pH/W	DIR	Time	Desc
D01	1/27/12	(b) (7)(C)		0947	Northeast corner of facility building with standing water on floor
D02	1/27/12			948	Southeast corner of facility building with standing water on floor
D03	1/27/12			0949	Central portion of ~~WHSE~~ facility building on north side
D04	1/27/12			0950	Central portion of facility building on south side
D05	1/27/12			974	Front of facility + office building
D06	1/27/12			145	Office within facility building
D07	1/27/12			148	Central portion of facility building on the north side
D08	1/27/12			152	Central portion of facility taken from doorway
D09	1/27/12			152	Central portion of facility on south side
D10	1/27/12			1210	(b) (7)(C) of leaching sample SD1-01
D11	1/27/12			309	Location of SD1-01 + SD1-02
D12	1/27/12			1320	Sample containers for SD1-01 + SD1-02
D13	1/27/12			1309	Sample containers for SD1-01 + SD1-02
D14	1/27/12			1312	Sample location for SD1-03
D15	1/27/12			1313	Sample containers for SD1-03
D16	1/27/12			1314	Sample location for SD1-08
D17	1/27/12			1315	Tobias Richards taking pH of standing liquid in drainage area
D18	1/27/12			1316	Sample location for SD1-05
D19	1/27/12			1317	Sample containers at location SD1-08
D20	1/27/12			1336	Sample location for SD1-06
D21	1/27/12			1337	Sample containers at location SD1-06

(b) (7)(C)

(b) (7)(C) 11/30/12

TO-0001-12-01-05

11/30/12 (b) (7)(C)

Camera Olympus Stylus Tough 6000

[redacted] TO-0001-12-01-03

Photolog cont'd: [redacted] +

[redacted]

ID	Date	Ph[redacted]	Time	Desc.
022	1/27/12	[redacted]	1432	pH strip showing pH of 5 from liquid on ground in drainage
023	1/27/12	[redacted]	1432	Sample location S01-08. Notice corrosion on pathway
024	1/27/12	[redacted]	1442	Sample location on S01-08 showing north side of north side of building
025	1/27/12	[redacted]	1442	Sample containers at location S01-08 building + sample containers
026	1/27/12	[redacted] E	1444	View of property on north side
027	1/27/12	[redacted] W	1455	Sample jars at sample location S01-07
028	1/27/12	[redacted] D	1456	Sample jars at sample location S01-07
029	1/27/12	[redacted] D	1457	pH strip indicating pH of liquid from back room on east side
030	1/27/12	[redacted] E	1458	Standing liquid in ~~back~~ backroom on east side ~~of prop~~ of property. pH [illegible] 2
031	1/27/12	[redacted] E	1459	Backroom on east side of property showing concrete curbing
032	1/27/12	[redacted] E	1500	Backroom on eastside of property showing concrete curbing
033	1/27/12	[redacted] W	1501	60 gallon tubs containing liquid and sludge like material
034	1/27/12	[redacted] W	1502	taking pH of sludge in 60 gallon tub
035	1/27/12	[redacted] W	1503	pH of sludge in 60 gallon tub - Low pH less than 2
036	1/27/12	[redacted] W	1504	pH of liquid in gallon tub. pH is less than 2.
038	1/27/12	[redacted] W	1505	drums, cylinders, + forklift in central room in facility
038/039	1/27/12	[redacted] NE	1620	Sample jars at sample location S03-01 at building 3
039/040	1/27/12	[redacted] NE	1621	Sample jars at sample location S03-01 at building 3
040/037	1/27/12	[redacted] SW	1505	tubs, drums + cylinders in central room in facility
041	1/27/12	[redacted] S	1622	Sample jars at sample location S03-02 at building 3
042	1/27/12	[redacted] SE	1623	Sample jars at sample location S03-02 at building 3
043	1/27/12	[redacted] NW	1624	Sample jars at sample location S03-03 behind building 3

[redacted] 1/27/12

1/27/12 TO-0001-12-01-03

[redacted]

[redacted] 1/27/12

Photolog (cont): EPMR Assessment

Photographer (b) (7)(C)

ID	Date	ph/l	Time	Desc.
044	1/27/12	(b) (7)(C)	1624	Sample jars.
045	1/27/12		1625	Sample jars
046	1/27/12		1626	Sample jars.
047	1/27/12		1627	Sample jars at
048	1/27/12		1653	pH taken of
049	1/27/12		1657	blue green po
050	1/27/12		1658	pH taken of
051	1/27/12		1659	liquid on flo
052	1/27/12		1700	Sludge found.
053	1/27/12		1714	Sample jars
054	1/27/12		1715	Sample jars
055	1/27/12		1756	Sample jars
056	1/27/12		1756	Sample jars
057	1/27/12		1757	Sample bottle
058	1/27/12		1810	Overview
059	1/27/12		1811	Overview
060	1/27/12		1812	Overview
061	1/27/12		1813	Hose found
062	1/27/12		1814	Overview
063	1/27/12		1815	Overview
064	1/27/12		1816	Overview
065	1/27/12		1817	Crate found
Last Entry in Logbook - End of Logbook				

(b) (7)(C) 1/30/12

(b) (7)(C)

044	at sample location SO3-03 behind building 3
045	at sample location SO3-03 behind building 3
046	at sample location SO3-04 behind building 3
047	sample location SO3-04 behind building 3
048	liquid in blue-green kid pool pH is less than 2
049	ol with minor amount of liquid
050	liquid on floor at west end of building 2
051	or on west end of building 2
052	in drums on north end of building 2
053	at sample location SO2-01
054	at sample location SO2-01
055	and bottles at ~~tot~~ sample locations SO2-02, TO2-01,
056	at location SO2-02 & TO2-02
057	s at location TO2-01 + TO2-02
058	of Building 2
059	of Building 2
060	of Building 2
061	in building 2
062	of Building 2
063	of Building 2
064	of Building 2
065	in north side of building 2
Last Entry in Logbook	

(b) (7)(C) 1/30/12

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6 32281 39112 8

Attachment K

TDD No. TO-0001-12-01-03 and Amendments A-C

EPA

U.S. EPA
Washington, DC 20460

START3
Technical Direction Document

Response Activities- REMOVAL
Funds (0001)
Weston Solutions, Inc.

TDD #: TO-0001-12-01-03
Contract: EP-W-06-042

! = required field ☐ Moved To EAS

Note: Remaining Amount includes $0.00 in Reserve.

TDD Name:	IPMR	! Period:	Base Period
! Purpose:	Work Assignment Initiation	Verbal Date:	01/24/2012
! Priority:	High	! Start Date:	01/25/2012
Overtime:	Yes	! Completion Date:	06/22/2012
! Funding Category:	Removal	Invoice Unit:	
! Project/Site Name:	IPMR	WorkArea:	RESPONSE ACTIVITIES
Project Address:	1416 Industrial Drive	Activity:	Emergency Response
County:	Rockwall	Work Area Code:	
City, State:	Royse City, TX	Activity Code:	RV
Zip:	75189	EMERGENCY CODE:	☐ KAT ☐ RIT
! SSID:	A6DK	FPN:	
CERCLIS:		Performance Based:	No
Operable Unit:			

Authorized TDD Ceiling:	Cost/Fee	LOE (Hours)
Previous Action(s):	$0.00	0.0
This Action:	$15,000.00	0.0
New Total:	$15,000.00	0.0

Specific Elements

Description of Work:

All activities performed in support of this TDD shall be in accordance with the contract and TO PWS.

Contractor shall conduct a Tier 1 response with focus on air monitoring, sampling, and analytical services at a precious metals recovery facility. Contractor shall provide written and photographic documentation, website updates, draft POLREPs, maps, and a final report. Contractor shall be prepared for level B sampling of drums and totes. Contractor shall mobilize the MCP and air monitoring equipment as needed for this response. Contractor shall provide technical support as needed. Contractor shall transport the samples to the EPA Region 6 lab or designated laboratory for analytical services. Contractor shall be prepared to provide analytical services as needed.

Accounting and Appropriation Information

SFO: 22

Line	DCN	IFMS	Budget/ FY	Appropriation Code	Budget Org Code	Program Element	Object Class	Site Project	Cost Org Code	Amount
1	RSC029	XXX	11	T	6A00S	302DC6C	2505	A6DKRV00	C001	$15,000.00

Funding Summary:	Funding
Previous:	$0.00
This Action:	$15,000.00
Total:	$15,000.00

Funding Category
Removal

Section

- Signed by Adam Adams/R6/USEPA/US on 01/29/2012 07:38:28 PM, according to Cheng Wei Feng/s

: Adam Adams **Date:** 01/29/2012

Phone #:

Project Officer Section - Signed by Cora Stanley/R6/USEPA/US on 01/30/2012 11:06:13 AM, according to C

Project Officer: Linda Carter **Date:** 01/30/2012

Contracting Officer Section - Signed by Cora Stanley/R6/USEPA/US on 01/30/2012 11:06:13 AM, according

Contracting Officer: Cora Stan **Date:** 01/30/2012

Contractor Section - Signed by (b) (7)(C) start6/rfw-start/us on 01/31/2012 06:14:07 AM, according to

● No During the past thre r years has your company, or any of your employees that will

○ Yes be working at this site, previously performed work at this site /facility?

Contractor Contact: (b) (7)(C) **Date:** 01/31/2012

EPA

U.S. EPA
Washington, DC 20460

START3
Technical Direction Document

Response Activities- REMOVAL
Funds (0001)
Weston Solutions, Inc.

TDD #: TO-0001-12-01-03
Amendment#:A
Contract: EP-W-06-042

! = required field ☐ Moved To EAS

TDD Name:	IPMR	! Period:	Base Period
! Purpose:	Change Period of Performance, Incremental Funding		
! Priority:	High	! Start Date:	01/25/2012
Overtime:	Yes	! Completion Date:	08/15/2012
! Funding Category:	Removal	Invoice Unit:	
! Project/Site Name:	IPMR	WorkArea:	RESPONSE ACTIVITIES
Project Address:	1416 Industrial Drive	Activity:	Emergency Response
County:	Rockwall	Work Area Code:	
City, State:	Royse City, TX	Activity Code:	RV
Zip:	75189	EMERGENCY CODE:	☐ KAT ☐ RIT
! SSID:	A6DK	FPN:	
CERCLIS:		Performance Based:	No
Operable Unit:			

Authorized TDD Ceiling:	Cost/Fee	LOE (Hours)
Previous Action(s):	$15,000.00	0.0
This Action:	$5,500.00	0.0
New Total:	$20,500.00	0.0

Specific Elements

Description of Work:

All activities performed in support of this TDD shall be in accordance with the contract and TO PWS.
Contractor shall conduct a Tier 1 response with focus on air monitoring, sampling, and analytical services at a precious metals recovery facility. Contractor shall provide written and photographic documentation, website updates, draft POLREPs, maps, and a final report. Contractor shall be prepared for level B sampling of drums and totes. Contractor shall mobilize the MCP and air monitoring equipment as needed for this response. Contractor shall provide technical support as needed. Contractor shall transport the samples to the EPA Region 6 lab or designated laboratory for analytical services. Contractor shall be prepared to provide analytical services as needed.

Amendment A extends the period of performance to 8/15/2012 and adds additional funding to cover report completion. ER Report shall include detailed mapping along with standard report information.

Accounting and Appropriation Information

SFO: 22

Line	DCN	IFMS	Budget/ FY	Appropriation Code	Budget Org Code	Program Element	Object Class	Site Project	Cost Org Code	Amount
1	RSC029	XXX	11	T	6A00S	302DC6C	2505	A6DKRV00	C001	$5,500.00

Funding Summary:	Funding
Previous:	$15,000.00
This Action:	$5,500.00
Total:	$20,500.00

Funding Category
Removal

Section
- Signed by Adam Adams/R6/USEPA/US on 04/03/2012 11:44:07 AM, according to Cheng Wei Feng/s
: Adam Adams **Date:** 04/03/2012
Phone #:
Project Officer Section - Signed by Cora Stanley/R6/USEPA/US on 04/05/2012 09:11:50 AM, according to C
Project Officer: Linda Carter **Date:** 04/05/2012
Contracting Officer Section - Signed by Cora Stanley/R6/USEPA/US on 04/05/2012 09:11:50 AM, according
Contracting Officer: Cora Stanley **Date:** 04/05/2012
Contractor Section
Contractor Contact: **Date:**

EPA

U.S. EPA
Washington, DC 20460

START3
Technical Direction Document

Response Activities- REMOVAL
Funds (0001)
Weston Solutions, Inc.

TDD #: TO-0001-12-01-03
Amendment#:B
Contract: EP-W-06-042

! = required field ☐ Moved To EAS

TDD Name:	IPMR	! Period:	Base Period
! Purpose:	Change Period of Performance		
! Priority:	High	! Start Date:	01/25/2012
Overtime:		! Completion Date:	09/14/2012
! Funding Category:	Removal	Invoice Unit:	
! Project/Site Name:	IPMR	WorkArea:	RESPONSE ACTIVITIES
Project Address:	1416 Industrial Drive	Activity:	Emergency Response
County:	Rockwall	Work Area Code:	
City, State:	Royse City, TX	Activity Code:	RV
Zip:	75189	EMERGENCY CODE:	☐ KAT ☐ RIT
! SSID:	A6DK	FPN:	
CERCLIS:		Performance Based:	No
Operable Unit:			

Authorized TDD Ceiling:	Cost/Fee	LOE (Hours)
Previous Action(s):	$20,500.00	0.0
This Action:	$0.00	0.0
New Total:	$20,500.00	0.0

Specific Elements

Description of Work:

All activities performed in support of this TDD shall be in accordance with the contract and TO PWS.
Contractor shall conduct a Tier 1 response with focus on air monitoring, sampling, and analytical services at a precious metals recovery facility. Contractor shall provide written and photographic documentation, website updates, draft POLREPs, maps, and a final report. Contractor shall be prepared for level B sampling of drums and totes. Contractor shall mobilize the MCP and air monitoring equipment as needed for this response. Contractor shall provide technical support as needed. Contractor shall transport the samples to the EPA Region 6 lab or designated laboratory for analytical services. Contractor shall be prepared to provide analytical services as needed.

Amendment A extends the period of performance to 8/15/2012 and adds additional funding to cover report completion. ER Report shall include detailed mapping along with standard report information.

Amendment B extends the period of performance to 9/14/2012 to provide review/comment time to EPA. There is no increase in cost/fee.

Accounting and Appropriation Information

SFO:

Line	DCN	IFMS	Budget / FY	Approp Code	Budget Org Code	Program Element	Object Class	Site Project	Cost Org Code	Amount
1										$0.00

Funding Summary:	Funding
Previous:	$20,500.00
This Action:	$0.00

Funding Category
Removal

Total:	$20,500.00

Section
- Signed by Terri Lewis/DC/USEPA/US on 08/14/2012 12:36:35 PM, according to Cheng Wei Feng/sta
: Adam Adams **Date:** 08/13/2012
Phone #:
Project Officer Section - Signed by Terri Lewis/DC/USEPA/US on 08/14/2012 12:36:35 PM, according to Cheng
Project Officer: Linda Carter **Date:** 08/13/2012
Contracting Officer Section - Signed by Terri Lewis/DC/USEPA/US on 08/14/2012 12:36:35 PM, according to Ch
Contracting Officer: Cora Stanley **Date:** 08/13/2012
Contractor Section - Signed by Terri Lewis/DC/USEPA/US on 08/14/2012 12:36:35 PM, according to Ch
Contractor Contact: **Date:**

EPA

U.S. EPA
Washington, DC 20460

START3
Technical Direction Document

Response Activities- REMOVAL
Funds (0001)
Weston Solutions, Inc.

TDD #: TO-0001-12-01-03
Amendment#:C
Contract: EP-W-06-042

! = required field ☐ Moved To EAS

TDD Name:	IPMR	! Period:	Base Period
! Purpose:	Incremental Funding		
! Priority:	High	! Start Date:	01/25/2012
Overtime:	Yes	! Completion Date:	09/14/2012
! Funding Category:	Removal	Invoice Unit:	
! Project/Site Name:	IPMR	WorkArea:	RESPONSE ACTIVITIES
Project Address:	1416 Industrial Drive	Activity:	Emergency Response
County:	Rockwall	Work Area Code:	
City, State:	Royse City, TX	Activity Code:	RV
Zip:	75189	EMERGENCY CODE:	☐ KAT ☐ RIT
! SSID:	A6DK	FPN:	
CERCLIS:		Performance Based:	No
Operable Unit:			

Authorized TDD Ceiling:	Cost/Fee	LOE (Hours)
Previous Action(s):	$20,500.00	0.0
This Action:	$700.00	0.0
New Total:	$21,200.00	0.0

Specific Elements

Description of Work:

All activities performed in support of this TDD shall be in accordance with the contract and TO PWS.
Contractor shall conduct a Tier 1 response with focus on air monitoring, sampling, and analytical services at a precious metals recovery facility. Contractor shall provide written and photographic documentation, website updates, draft POLREPs, maps, and a final report. Contractor shall be prepared for level B sampling of drums and totes. Contractor shall mobilize the MCP and air monitoring equipment as needed for this response. Contractor shall provide technical support as needed. Contractor shall transport the samples to the EPA Region 6 lab or designated laboratory for analytical services. Contractor shall be prepared to provide analytical services as needed.

Amendment A extends the period of performance to 8/15/2012 and adds additional funding to cover report completion. ER Report shall include detailed mapping along with standard report information.

Amendment B extends the period of performance to 9/14/2012 to provide review/comment time to EPA. There is no increase in cost/fee.

Amendment C provides incremental funding to complete the final report and close-out of the project.

Accounting and Appropriation Information

SFO: 22

Line	DCN	IFMS	Budget / FY	Approp Code	Budget Org Code	Program Element	Object Class	Site Project	Cost Org Code	Amount
1	RSC025	XXX	12	T	6A00S	303DC6	2505	A6DKRV00	C001	$700.00

Funding Summary:	Funding

Funding Category

Previous:	$20,500.00	Removal
		Removal Support
This Action:	$700.00	
Total:	$21,200.00	

Section

- Signed by Adam Adams/R6/USEPA/US on 08/27/2012 09:33:43 AM, according to Cheng Wei Feng/s

: Adam Adams **Date:** 08/27/2012

Phone #:

Project Officer Section - Signed by Cora Stanley/R6/USEPA/US on 08/27/2012 10:10:27 AM, according to Cheng

Project Officer: Linda Carter **Date:** 08/27/2012

Contracting Officer Section - Signed by Cora Stanley/R6/USEPA/US on 08/27/2012 10:10:27 AM, according to C

Contracting Officer: Cora Stanley **Date:** 08/27/2012

Contractor Section

Contractor Contact: **Date:**